

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

VERY REVEREND GEORGES F. de
LAIRE, J.C.L.,

Plaintiff,

v.

GARY MICHAEL VORIS, ANITA CAREY,
ST. MICHAEL'S MEDIA a/k/a CHURCH
MILITANT, and MARC BALESTRIERI

Defendants.

Civil No. 1:21-cv-00131-JL

**GARY MICHAEL VORIS, ANITA CAREY AND ST. MICHAEL'S
MEDIA'S MEMORANDUM IN SUPPORT OF OBJECTION TO
PLAINTIFF'S MOTION FOR JUDGMENT OF LIABILITY**

NOW COME defendants Gary Michael Voris, Anita Carey, and St. Michael's Media and respectfully object to the plaintiff's motion for a judgment of liability, and in support thereof state as follows:

1. Plaintiff asks this Court to impose the most powerful sanction in its arsenal in response to the non-defaulted defendants' failure to produce various requested documents in response to his discovery requests.

2. Defendants object.

3. For reasons fully set forth the attached memorandum of law, plaintiff is not entitled to this extraordinary relief and this Court should deny his motion.

WHEREFORE, the defendants respectfully object to plaintiff's requested relief and request that this Honorable Court:

A. Deny the requested relief; and

B. Grant such other relief as may be just and proper.

Respectfully Submitted
Gary Michael Voris, Anita Carey, and
St. Michael's Media
By thier attorneys,
Lehmann Major List, PLLC

November 8, 2023 */s/Richard J. Lehmann*

Richard J. Lehmann (Bar No. 9339)
6 Garvins Falls Road
Concord, N.H. 03301
(603) 731-5435
rick@nhlawyer.com

CERTIFICATION

I hereby certify that a copy of this pleading was this day forwarded to opposing counsel of record via the court's electronic service system.

November 8, 2023 */s/Richard J. Lehmann*

Richard J. Lehmann